

WESTCHESTER COUNTY OFFICE
580 White Plains Road
Suite 620
Tarrytown, NY 10591
(914) 345-3701 Fax: (914) 345-3743

Kaitlyn P. Long
Member CT, MA & NY Bars
(914) 593-7306
KLong@moodklaw.com

September 29, 2022

VIA ELECTRONIC CASE FILING

Hon. Kiyo A. Matsumoto
United States District Court
Eastern District of New York
225 Cadman Plaza East
Brooklyn, New York 11201

RE 1567 56th Street, LLC, 1569 56th Street, LLC, and Shlomo Braun v.
Abraham Teitelbaum
Index No.: 22-cv-4873
Our File No.: 1803.112080

Dear Honorable Matsumoto:

This office represents the defendants, Abraham Teitelbaum, Jehuda Weisz, and Dekel Abstract LLC, in the above-referenced matter. We respectfully request an extension of time to answer the Summons and Complaint of 1567 56th Street, LLC, 1569th Street, LLC and Shlomo Braun to and including October 31, 2022. We have recently been assigned the defense of this action and request an extension of time to properly investigate the allegations in order to interpose a responsive pleading.

We have consulted with Levi Huebner of Levi Huebner & Associates PC, who is representing the plaintiffs, 1567 56th Street, LLC, 1569th Street, LLC and Shlomo Braun. Mr. Huebner has agreed to the extension and in response, the defendants, Abraham Teitelbaum, Jehuda Weisz, and Dekel Abstract LLC, agree to waive affirmative defense of personal jurisdiction and do not contest venue. There have been no previous requests for an extension.

Very truly yours,

**MARKS, O'NEILL, O'BRIEN,
DOHERTY & KELLY, P.C.**



KAITLYN P. LONG

KPL/lah

{M0258792.1}

Philadelphia
Pennsylvania

Pittsburgh
Pennsylvania

Cherry Hill
New Jersey

Wilmington
Delaware

Towson
Maryland

New York
New York